

FORM TO BE USED BY A PRISONER FILING A COMPLAINT
UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. §1983

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

FILED _____ ENTERED _____
LODGED _____ RECEIVED _____

APR 30 2013

VASHON O CHRISTOPHER

1427201

401 E. Eager ST

BALTIMORE, MD 21207

(Full name, prison identification
number and address of the plaintiff)

v.

Civil Action No. JFM-13-1279
(Leave blank on initial filing to be filled in by Court.)

Warden, Assistant Warden of

Baltimore City Detention Center

401 East Eager Street

Baltimore, Maryland [21202]

(Full name and address of the defendant(s))

COMPLAINT

I. Previous lawsuits

- A. Have you filed other cases in state or federal court dealing with the same facts as in this case or against the same defendants?

YES ☐

NO ☒

- B. If you answered YES, describe that case(s) in the spaces below.

1. Parties to the other case(s):

Plaintiff: _____

Defendant(s): _____

AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
DEPUTY

APR 30 2013

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2. Court (if a federal court name the district; if a state court name the city or county): _____
3. Case No.: _____
4. Date filed: _____
5. Name of judge that handled the case: _____
6. Disposition (won; dismissed, still pending, on appeal): _____

7. Date of disposition: _____

II. Administrative proceedings

- A. If you are a prisoner, did you file a grievance as required by the prison's administrative remedy procedures?

YES ☒ NO ☐

1. If you answered YES:

a. What was the result? NONE

- b. Did you appeal?

YES ☐ NO ☒

2. If you answered NO to either of the questions above, explain why:

BECAUSE NO IN HOUSE GRIEVANCE OFFICER WILL GO AGAINST THE WARDEN SO I HAVE SENT A COPY TO THE GRIEVANCE OFFICE.

III. Statement of claim

(Briefly state the facts of your case. Include dates, times, and places. Describe what each defendant did or how he/she is involved. If you are making a number of related claims, number and explain each claim in a separate paragraph.)

THE WARDEN/OFFICER USE SCARE TACTICS VIBBAL THREATS LIKE DO THIS
OR THAT OR PACK UP. TAKE OUR VIST, COMMISARY, PHONE PRIVILEGES.
WAKE US UP AT 9:00^{AM} AND NOT ALLOWED TO GET BACK IN OUR BEDS
UNTIL AFTER INSPECTION SOMETIMES THE WARDEN DOES NOT COME
UNTIL THE NEXT DAY AND IF OUR BEDS, SHOES, TOILETS ARE NOT
LINED UP WE ARE TOLD TO PACK UP AND SENT TO A CELL/LOCK UP.

IV. Relief

(State briefly what you want the Court to do for you.)

^{want}
We all detainees to be treated the same/equal, and for
this boot camp atmosphere/scare tactics to end.

SIGNED THIS 05 day of, APRIL 2013.

Verdon Christopher
(original signature of plaintiff)

401 E. EAGER ST

BAITIMORE, MD 21202

ID 1427201
(address of plaintiff)

RANKING MEMBER, COMMITTEE ON
OVERSIGHT AND GOVERNMENT REFORM

COMMITTEE ON
TRANSPORTATION AND INFRASTRUCTURE

SUBCOMMITTEE ON COAST
GUARD AND MARITIME TRANSPORTATION

SUBCOMMITTEE ON
HIGHWAYS AND TRANSIT

JOINT ECONOMIC COMMITTEE

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House of Representatives
Washington, DC 20515

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www.house.gov/cummings

March 21, 2013

Mr. Vashon Christopher, #1427201
BCDC
401 East Eager Street
Baltimore, MD 21202

Dear Mr. Christopher:


I am in receipt of your correspondence requesting my assistance.

I have sent an inquiry on your behalf along with a copy of your correspondence to the Department of Public Safety and Correctional Services (DPSCS).

Please know that it may take some time for DPSCS to review your concerns and respond.

Upon receipt of a response from DPSCS to my inquiry, I will be back in touch with you.

Sincerely,


Elijah E. Cummings
Member of Congress

EEC/dg

(1)

By submitting this info we all are subjected to disciplinary removal. So can you please help with this matter.

INMATES (P & Q) SECTION COMPLAINT
BEDC 401 E. EAGER ST
BALTIMORE, MARYLAND 21202

MARCH 11, 2013

~~Public~~ Justice Center
~~1~~ North CHARLES STREET
~~Baltimore~~, MARYLAND 21202

RE: COMPLAINT AGAINST ASSISTANT WARDEN
OLIVER & SECTION CONDITIONS.

TO WHOM IT MAY CONCERN:

WE THE INMATES CURRENTLY INCARCERATED AT THE BALTIMORE CITY DETENTION CENTER ON P & Q SECTION RESPECTFULLY REQUEST THAT THE PUBLIC JUSTICE CENTER INVESTIGATE THE THREATS, HARASSMENT AND PERSONAL RULES AND REGULATIONS THAT'S BEING ENFORCED BY THE ASSISTANT WARDEN OLIVER. THE CONDITIONS THAT HAS BEEN SET BY ASSISTANT WARDEN OLIVER, IF NOT MET, WILL RESULT IN THE INMATE BEING REMOVED FROM THE DORM OR RECEIVING A INFRACTION AND PLACED ON SEGREGATION. EACH INMATE ON P & Q SECTION WAS CLASSIFIED TO ONE OF THESE SECTIONS. BUT MRS. OLIVER ARBITRARY WITHOUT AN INFRACTION INFRACTION REMOVED INMATES BY NOT FOLLOWING HER RULES.

THESE RULES AND COMPLAINTS ARE AS FOLLOWING IN NO PARTICULAR ORDER.

1) INMATES ARE REQUIRED TO GET OUT OF BED BY 9:00 AM AND MAKE UP THEIR BED. INMATES ARE NOT ALLOWED TO GET BACK UNDER THE COVER OF

(2)

his bed until after 6:00 P.M. Visitors will be removed from the section.

2) Inmates are not allowed to wash undergarments (T-shirts, socks or underwear) and hang them up to dry for the next day or two. Laundry day is once a week and the institution do not issue out undergarments to inmates. Most inmates have just the undergarments from the date of arrest to four sets from the first pair and initial package set of three.

3) Inmates are required to eat in the dorm where there's no tables within the dorm setting like J. I. Building [Tables in the hall are not put in use].

4) Inmates are restricted to the dorm throughout the course of the day besides for a pass, gym or use of the phone. Unlike J. I. Building, phones and tables are outside of the dorms. Tables outside the dorms are not for use, but tables are not allowed (or chairs) inside the dorm for entertainment such as card games, board games etc. O in we have to stand or sit on floor to eat.

5) Inmates are required to wear their issued institutional jumper all day within the dorm until they get into bed.

6) Bends are not allowed for clothing, but inmates are not allowed to place clothing in a bag under their bunk. Clothing must be folded and placed under the inmate mattress. However, the mattress must not be raised by the inmate clothing.

7) Inmates must be standing at attention by their bunk, institutional issued jumpers on, fully button up (no opening or broken buttons) when warranted that the Assistant Warden (Oliver) is coming.

(3)

Inmates that violate any of these rules according to Assistant Warden Oliver will either receive an infraction or slip with three words quote "pack up belonging." These inmates will be removed from their respective classified section.

Therefore, we respectfully request that the Public Justice Center investigate these regulation in which we consider to be arbitrary as well as cruel and unusual punishment infringing upon our United States Constitutional rights under the ~~eight~~ ~~eight~~ Eighth Amendment. We were not issued shackles or notified of any new charges.

Respectfully submitted,
Prisoners of Section Inmates

- | | |
|------------------------------------|------------------------------------|
| 1) James Johnson #401-423 | 19) Vashon Christopher 1427201 |
| 2) Lawrence McQueen #881182 | 20) Mark Jackson 40000 |
| 3) Antwan #1104625 | 21) Melville Hughes 1308106 |
| 4) William Lury #985245 | 22) Santo Clark 1915176 |
| 5) Mark Jackson #887575 | 23) DAWAN HARRIS 3216387 |
| 6) Brandon Montgomery SR. #1929297 | 24) Ronnie Richardson 411-321 |
| 7) Avon [REDACTED] | 25) LIL SHARIG LAFAYETTE PROJECT # |
| 8) MAURICE COLEMAN 98486 | 26) Franklin Lewis 8556 |
| 9) Donald Wilson | 27) George Barney |
| 10) William Harmonson | 28) Eric 1938001 |
| 11) Kevin Martin 1982340 | 29) Curtis Hall 1201044 |
| 12) THOMAS IARBELLA 2790525 | 30) Kevin Jackson 3807114 |
| 13) Wade Mills 3329826 | 31) Donnelle Jones 1658723 |
| 14) Earl White 343-2178 | 32) Randolph Massey 146271 |
| 15) [REDACTED] | 33) Demetrius Johnson |
| 16) [REDACTED] #1929297 | 34) Reginald Jones |
| 17) [REDACTED] | 35) David Gular 1276138 |

37) Kelvin Wallace 979482	67)	
38) Russell Thomas 1901037	68)	James King
39) James Thomas 1084489	69)	
40) Rodney Thomas 1294289	70)	
41) James Thomas 2222649	71)	
42) James Thomas 355050	72)	
43) James Thomas 355050	73)	
44) James Thomas 355050	74)	
45) James Thomas 355050	75)	
46) Melbourne 3214995	76)	
47) James Thomas 355050	77)	
48) James Thomas 355050	78)	
49) James Thomas 355050	79)	
50) James Thomas 355050	80)	
51) Robert Smith #940-011	81)	
52) Michael DeLoatch 200-7882	82)	
53) Eric Funderbuck 1257651	83)	
54) Gimaire McClarkin	84)	
55) Charles G. P. 155969	85)	
56) Edmund Lee 1204942	86)	
57) James Thomas 355050	87)	
58) Kenneth Baker 354235	88)	
59) Eric Bell 124289	89)	
60) Harold Butler 2048131	90)	
61) Adrian Brown 1556616	91)	
62) Dwight Roney 2861648	92)	
63)	93)	
64)	94)	
65)	95)	
66)	96)	

CERTIFICATE OF SERVICE

I hereby certify that on this 05 day of APRIL, 2013, a copy of this _____, was mailed, postage prepaid, to _____
(name and address of the attorney or person to whom you sent it).

Mark Christopher

It is not necessary to state in the certificate of service that copies were sent to the Court or to the Clerk.

Do not file any motions or memoranda that are longer than fifty pages unless you have received permission from the Court. Most motions and memoranda should be much shorter than fifty pages.

You do not have to file copies of exhibits that are already on file in the same case. For example, if the defendants in your case file a motion for summary judgment and attach as an exhibit to their motion a copy of a sick call slip, you do not have to attach a copy of that document to your opposition or to any motions you file. You may simply refer to the copy that is already in the file.

You must sign every pleading, motion, and memorandum that you file. You MAY NOT sign someone else's name, nor may you file anything on behalf of someone else. In order for a pleading, motion, or memorandum to be considered on behalf of more than one plaintiff, each plaintiff must sign it.